

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

TITLE V RENEWAL DRAFT PERMIT NO. V-06-017

MONTAPLAST OF NORTH AMERICA, INC.

FRANKFORT , KY

April 7, 2006

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SOURCE I.D. #:21-073-00048

SOURCE A.I. #: 1412

ACTIVITY #: APE20050003

**SOURCE DESCRIPTION:**

Montaplast of North America, Inc. manufactures automotive wheel covers and intake manifolds. The plant is located at 2011 Hoover Boulevard, in Frankfort, Kentucky. The Standard Industrial Classification (SIC) Code for this source is 3714, *Motor Vehicle Parts and Accessories*. The plant consists of the following operational areas : injection molding machines, washing lines, paint spray booths, lost core processes, regrinders, and hopper dryers. The injection molding machines extrude the wheel covers. The washing line cleans the plastic wheel covers prior to painting. The painting process consists of two spray booths, a base coat booth and a clear coat booth. Each spray booth consists of a water wall to control over spray of the paint. The lost core process is equipped with injection molding machines to form automobile intake manifold. Reject wheel covers and intake manifolds are sent to the regrinders / shredders.

The source consists of the following significant permitted emission units:

(01) Basecoat Paint Booth

(02) Clear Coat Paint Booth

Insignificant activities of the source are listed in the Section C of the permit.

Currently, the source is holding a Title V/Synthetic Minor permit. The source is potentially major for VOC and HAP emissions. This permit is the renewed issuance of the source's Title V operating permit.

**COMMENTS:**

**Type of control and efficiency:**

Neither of the significant VOC and HAP emission points are equipped with control. Particulate matter emissions consisting of overspray from EP01 and 02 are controlled by a water wall at a facility claimed efficiency of 95%.

**Emission factors and their source:**

Emissions of VOC and HAPs from each type of base coat, clear coat, solvent thinner, diluent, or any other volatile material used are based on the formulation (MSDS) of each material using material balance. Total VOC and HAP (single and combined) as contained in the applied coatings, diluents and cleaning solvents are assumed to be released as air emissions (i.e., 100 percent volatilization). PM/PM<sub>10</sub> emissions reflect material solids content and material balance. Combustion related emissions for insignificant activities are based on AP-42.

**Applicable Regulations:**

a. 401 KAR 59:010, *New Process Operations*

Pursuant to 401 KAR 59:010, Section 1, the requirements of this rule apply to each affected facility, associated with a process operation, which is not subject to another emission standard with respect to particulates in 401 KAR Chapter 59, and which commenced operation on or after July 2, 1975. The requirements of this rule are included in the permit for the Basecoat Paint Booth and the Clear Coat Paint Booth. The requirements of this rule are also applicable to each of the molding wheel covers, injection intake manifolds, regrinders / shredders and hopper dryer, which are listed in Section C of the permit as insignificant activities.

b. Pursuant to 401 KAR 50:012, General Application of Administrative Regulations and Standards, in the absence of a standard specified in the administrative regulations, 401 KAR Chapters 50 to 65, all major air contaminant sources shall, as a minimum, apply control procedures that are reasonable, available, and practical. Within ninety (90) days of the issuance of the Title V permit, the permittee shall submit a determination to the Division for Air Quality's Frankfort Central Office to verify that all control procedures utilized to minimize VOC emissions are reasonable, available, and practical, in accordance with 401 KAR 50:012.

c. 401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances* and 401 KAR 63:022, *New or Modified Sources Emitting Toxic air Pollutants*

The requirements pursuant to 401 KAR 63:022 were repealed on January 19, 1999. This notwithstanding, during the review for initial TV Permit No. 99-V-045, the Division determined the requirements for this previously applicable rule to be satisfied by maintaining the potential to emit VOC for the source (and paint booths) below 250 tons per year. The requirements of 401 KAR 63:020 also apply since the facility emits or may emit potentially hazardous matter or toxic substances as defined at 401 KAR 63:020, Section 2. Consistent with the decision relating to 401 KAR 63:022, the source is considered to comply with 401 KAR 63:020 by complying with the source-wide limit for single HAPs, combined HAPs and total VOC. The permittee shall, however, demonstrate compliance with the requirements of 401 KAR 63:020 by air dispersion modeling, emission calculations, or performance tests at any time as may be specified by the Division.

d. The requirements of 401 KAR 63:002, incorporating by reference 40 CFR 63, Subpart PPPP, *National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*, are not included in the permit because the permittee has elected to accept a plant-wide limit on HAP emissions that limits the rolling 12-month emissions of any single HAP to 9 tons per year and 22.5 tons per year for combined HAP emissions. Compliance with these limits shall make this source an area source, as such is defined at 40 CFR 63.2, and the requirements of 40 CFR 63, Subpart PPPP do not apply.

e. The requirements of 40 CFR 64, *Compliance Assurance Monitoring (CAM)* apply to major sources that use pollution control systems to achieve compliance with established regulatory or permit limits. There are no emission units at this source that are major emission units and that use pollution control systems for emission limit compliance. Therefore, CAM is not applicable to this facility.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The permittee has elected to accept a plant-wide emission limit of 225 tons per year for VOC emissions to preclude the applicability of Regulation 401 KAR 51:017, *Prevention of Significant Deterioration (PSD) of Air Quality*. Accordingly, the permit contains requirements for the permittee to calculate and maintain records of the actual VOC emissions from the entire facility for any 12-consecutive month period.

The permittee has elected to accept a plant-wide limit on HAP emissions that limits the rolling 12-month emissions of any single HAP to 9 tons per year and 22.5 tons per year for combined HAPs to preclude the applicability of 40 CFR 60, Subpart PPPP, *National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products*. Accordingly, the permit contains requirements for the permittee to calculate and maintain records of the actual single and combined HAP emissions from the entire facility for any 12 consecutive month period.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.